

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Billed Party Preference)
For 0+ InterLATA Calls)

CC Docket 94-237 3 26 PM '94

COMMENTS OF THE GREENVILLE COUNTY DETENTION CENTER, GREENVILLE, S.C.

Perry R. Eichor, Director -- Greenville County Department of Community Services and the Greenville County Detention Center (G.C.D.C.), in opposition to the enactment of Billed Party Preference (BPP) because it will dilute my authority to control inmate calling, will result in increased fraud and hardships in terms of wasted manpower, and will increase expenses to inmate families. **Contracts requiring rate guarantees and rate monitoring will protect inmate families far better than BPP.**

My specific objections to the enactment of BPP are as follows:

1. BPP will undermine G.C.D.C. ability to control inmate calling.

As a correctional facility administrator, I feel that the administrator is in the best position to evaluate what call controls are necessary and in the best interest of inmates and the general public -- not the federal government. Telephone call controls are necessary in order to prevent abuse and fraud. Call abuse and fraud at correctional facilities are worse than at non-inmate locations! Inmates have 24 hours a day, 7 days a week to try to beat the system and call abuse is easy for them, especially if multiple providers are involved. BPP will grant every inmate at my facility a new federal right to use the long distance carrier of his choice. As the custodian of that inmate, I will no longer have control over how inmate calls are routed. Under BPP, inmates could conceivably harass judges, witnesses and jury members involved in their convictions--or even the victims of their crimes! Allowing inmate calls to go to any long distance carrier, as opposed to a service provider chosen by me and contractually committed to provide call and fraud controls, will threaten security. It is necessary to have a service provider with whom I am in daily contact, one who can service my needs by installing number blocking, screening out calls to persons inmates wish to threaten, and eliminating a primary avenue of gang control inside the walls. I oppose any federal interference with my ability to manage and control inmates' calling.

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2. BPP will eliminate current revenue-sharing arrangements that fund important inmate programs and create new financial burdens for G.C.D.C.

The realities of prison and jail funding dictate that a cooperative effort with an inmate phone provider who provides the sophisticated inmate calling systems required be established, as there is no way G.C.D.C. could afford to provide such a system from County monies. The revenue-sharing arrangements with our inmate phone provider have been an innovative and effective means of financing important inmate projects. We have been able to computerize our inmate canteen operation thereby reducing fraud and increasing services, provide a more secure way of identifying inmates, furnish the inmates with quality televisions in virtually every cell and buy inmate recreational equipment with these funds. It would not have been possible to fund these projects through the general budget. When our new facility opens in the Fall, we will have the space to provide inmates with more programs than are available now, such as education and drug rehabilitation programs and a library. Funding for each of these programs will come from the inmate phone system revenue. I am unable to finance these programs through the general budget. The financing of sophisticated inmate calling systems through the general budget is also not possible. The public and legislators do not want to provide amenities for inmates, especially during a time when Greenville County is right-sizing its government and reducing spending in all areas. Enactment of BPP will significantly impact our revenue-sharing arrangements. All inmate programs and other inmate items whose existence depends on this revenue will be in jeopardy unless the Federal Government is going to impose an unfunded mandate on local facilities and require the purchase and installation of an inmate phone system.

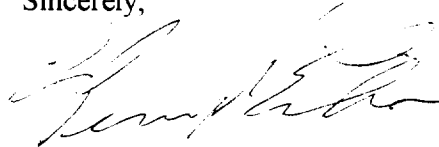
In short, I oppose any federal effort that infringes on my ability to provide inmates an effective phone system and fund other important inmate programs. At a time of fiscal crisis in government, the FCC should not be cutting off a critical source of revenue that benefits inmates.

3. BPP is not the way to ensure reasonable rates for inmate calling.

As a jail administrator, I am sensitive to the cost of collect calls to inmate families. G.C.D.C. used an exhaustive selection process to make sure that all providers considered had the proper tariffs and a clear history of regulatory compliance. There are inmate phone providers who do not have the proper tariffs filed and approved and are charging customers too much for phone calls. Our selection process identified and filtered out those companies. I have received calls from families asking about the cost of accepting calls from inmates at G.C.D.C. and have been able to honestly assure them that the rates were fair. They appreciated the selection process we used to select our inmate phone provider. That is what families of inmates want. Enactment of BPP will serve to frustrate and anger inmates and their families, deprive G.C.D.C. of the revenue necessary to pay for important inmate programs, and directly affect my ability to minimize telephone abuse and fraud. **Enforcement of the current regulations and the cooperation of facility administrators in ensuring that their provider charges reasonable rates is the answer -- not Billed Party Preference.**

I oppose BPP. I consider it a complex federal effort that would effectively strip me of my responsibility over the welfare of inmates, and would be a more complex, costly and ineffective way of handling rate monitoring. Enactment of BPP will end inmate use of the telephone as far as I am concerned. If BPP is instituted, the danger to society of letting inmates control the collect calling system instead of the administration is just too great a threat to allow inmates the access they presently have to telephones.

Sincerely,



Perry R. Eichor
Director
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